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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,) NO. CR 19-377 WHA
15)
16 Plaintiff,) STIPULATION TO EXCLUDE TIME FROM
17 v.) OCTOBER 29, 2019 TO NOVEMBER 13, 2019
18) AND [PROPOSED] ORDER
19 ANTHONY SCOTT LEVANDOWSKI,)
20)
21 Defendant.)
22)

21 **STIPULATION**

22 The parties appeared for a status conference before the Honorable William Alsup on October 29,
23 2019, at which time the Court ordered that defendant file a motion for a bill of particulars by November
24 6, 2019 and that the parties file briefs on the law specifying trade secrets in a criminal case by November
25 11, 2019. The Court set a hearing for November 13, 2019 at 1:00 p.m. Discovery is ongoing. The
26 parties stipulated, and the Court ordered, that time between October 29, 2019 and November 13, 2019,
27 be excluded for effective preparation of counsel pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv).

1 The parties further stipulate, and ask the Court to find, that the requested continuance and
2 exclusion of time are in the interests of justice and outweigh the best interest of the public and the
3 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

4 The undersigned Assistant United States Attorney certifies that she has obtained approval from
5 counsel for the defendant to file this stipulation and proposed order.

6 IT IS SO STIPULATED.

7 DATED: November 1, 2019

/s/
KATHERINE L. WAWRZYNIAK
ANDREW F. DAWSON
AMIE D. ROONEY
Assistant United States Attorneys

10 DATED: November 1, 2019

/s/
MILES EHRLICH
ISMAIL RAMSEY
AMY E. CRAIG
RAMSEY & EHRLICH LLP
Counsel for Defendant Levandowski

14
15 **[PROPOSED] ORDER**

16 Based upon the facts set forth in the stipulation of the parties and the representations made to the
17 Court on October 29, 2019, this matter is continued until November 13, 2019, at 1:00 p.m. The time
18 between October 29, 2019, and November 13, 2019, is excluded from the running of the speedy trial
19 clock for effective preparation of counsel under 18 U.S.C. § 3161(h)(7)(B)(iv). Failure to grant the
20 continuance would deny the defendants' counsel the reasonable time necessary to prepare, taking into
21 account the exercise of due diligence. The Court further finds that the ends of justice served by
22 excluding the time from October 29, 2019 to November 13, 2019 from computation under the Speedy
23 Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §
24 3161(h)(7)(A).

25 IT IS SO ORDERED.

27 DATED: _____

HONORABLE WILLIAM ALSUP
United States District Judge